

# Morgan Lewis

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October 25, 2024

**VIA ECF**

The Honorable J. Paul Oetken  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 706  
New York, NY 10007

Re: John Doe v. Intel Corporation et al., No. 1:24-cv-06117

Your Honor:

Plaintiff John Doe and Defendants Intel Corporation, Abdul Jarrar, and Alaa Badr (collectively, the "Parties"), in an effort to avoid unnecessary costs of litigation and to conserve the Court's judicial resources, respectfully jointly request this Court stay all discovery and other deadlines in this matter -- including vacating the October 15, 2024 Order of Automatic Referral to Mediation (ECF No. 43), adjourning the Initial Conference set for November 13, 2024 (ECF No. 20) and adjourning the November 5, 2024 deadline for Plaintiff to indicate whether he intends to proceed under his real name and the related deadline for Plaintiff to file the Complaint under his real name (ECF No. 46), as well as any deadlines to file a motion for reconsideration or a notice of appeal in connection with Court's decision denying Plaintiff's motion to proceed pseudonymously -- to allow the Parties time to attend private mediation to attempt to resolve this matter. The Parties have not requested any other adjournment or extension of time in this matter to date.

The Parties have agreed to pursue private mediation in the hopes that a mediator of their choosing will increase the likelihood of resolving this matter. The Parties have agreed to mediate before Judge Layn R. Phillips of Phillips ADR Enterprises on December 19, 2024. Therefore, the Parties respectfully request that all current deadlines and the referral to the SDNY Mediation Program be vacated.

A temporary stay while the Parties pursue private mediation will allow the Parties to focus their efforts on attempting to amicably resolve this matter, while also preserving judicial resources and avoiding additional costs to the Parties. As part of this, the Parties jointly request that the Initial Conference currently scheduled for November 13, as well as all related discovery and other deadlines, be adjourned *sine die* and, if the matter does not resolve at mediation, rescheduled for a later date. In addition, the Parties respectfully request that the deadlines for Plaintiff to confirm whether he will proceed under his real name and, if so, to file a Complaint using his real name, be adjourned *sine die* and, if a resolution is not achieved at mediation, rescheduled for a later date.

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The Parties propose a deadline of fourteen (14) days following mediation to submit a joint status report to the Court and, if mediation is unsuccessful, a proposed case management plan pursuant to Fed. R. Civ. P. 26(f).

The Parties therefore respectfully request that the Court enter an Order staying this case and all pending deadlines while the Parties prepare for and participate in private mediation.  
Thank you for your consideration.

Respectfully submitted,

s/ Melissa C. Rodriguez  
Melissa C. Rodriguez

s/ Douglas H. Wigdor  
Douglas H. Wigdor

s/ Vincent Bauer  
Vincent Bauer

s/ Barbara Meister Cummins  
Barbara Meister Cummins

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**CERTIFICATE OF SERVICE**

I, Melissa C. Rodriguez, certify that on this 25th day of October 2024, I served the forgoing by causing a true and correct copy of the same to be delivered via ECF to counsel or record.

*s/ Melissa C. Rodriguez*  
Melissa C. Rodriguez